

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Christine Bennett

Debtor(s)

vs.

U.S. Bank National Association, AS TRUSTEE,
SUCCESSOR IN INTEREST TO BANK OF
AMERICA, NATIONAL ASSOCIATION, AS
TRUSTEE, SUCCESSOR BY MERGER TO
LASALLE BANK, NATIONAL ASSOCIATION, AS
TRUSTEE FOR MERRILL LYNCH FIRST
FRANKLIN MORTGAGE LOAN TRUST,
MORTGAGE PASS-THROUGH CERTIFICATES,
SERIES 2007-1

Respondent

CHAPTER 13

CASE NO. 19-11414 AMC

**RESPONSE OF U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE, SUCCESSOR IN
INTEREST TO BANK OF AMERICA, NATIONAL ASSOCIATION, AS TRUSTEE,
SUCCESSOR BY MERGER TO LASALLE BANK, NATIONAL ASSOCIATION, AS TRUSTEE
FOR MERRILL LYNCH FIRST FRANKLIN MORTGAGE LOAN TRUST, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2007-1 TO DEBTOR'S MOTION TO VACATE ORDER
GRANTING RELIEF**

Respondent, U.S. Bank National Association, AS TRUSTEE, SUCCESSOR IN INTEREST TO BANK OF AMERICA, NATIONAL ASSOCIATION, AS TRUSTEE, SUCCESSOR BY MERGER TO LASALLE BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR MERRILL LYNCH FIRST FRANKLIN MORTGAGE LOAN TRUST, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-1, by and through its counsel, KML Law Group, P.C. , hereby responds to the Debtor's Motion to Vacate Order Granting Relief as follows:

1. Admitted.
2. Admitted.
3. Admitted in part and denied in part. Any characterization of the discussions and negotiations between Creditor and Debtor are denied. It is admitted that this Motion has been filed.
4. Denied. Strict proof is demanded at time of trial.
5. Denied. Strict proof is demanded at time of trial.
6. Denied. Strict proof is demanded at time of trial.

WHEREFORE, Respondent respectfully requests that this Court enter an Order denying Debtor's Motion to Vacate Stay Relief.

/s/ **Rebecca A. Solarz, Esquire**

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Date: July 20, 2022